

Exhibit 1

ORIGINAL

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO. 04 11572 JLT

SUSAN COONEY,)
Plaintiff,)
vs.)
)
HUMANISTIC PSYCHOLOGY INSTITUTE,)
d/b/a SAYBROOK INSTITUTE and)
MAUREEN O'HARA, Individually,)
Defendants.)
)

AUDIOVISUAL DEPOSITION OF SUSAN COONEY, taken
on behalf of the Saybrook Institute, pursuant to the
Federal Rules of Civil Procedure, before Kristin L.
Tucker, Notary Public and Certified Shorthand Reporter
within and for the Commonwealth of Massachusetts, at the
Law Offices of Morrison Mahoney LLP, 250 Summer Street,
Boston, Massachusetts, on January 27, 2006, at 9:10
a.m., as follows:

DANILECKI REPORTING
234 Governors Road
Quincy, Massachusetts 02169
(617) 745-9786

1 A. Correct.

2 Q. So if Dr. O'Hara had actually talked about
3 WASC at one of these residential conferences and that
4 they're accreditation was coming up, that would have
5 been something that you might sit up and pay attention
6 to, correct?

7 A. If it had happened, yeah.

8 Q. And if somebody had used the term
9 accreditation site visit in the context of WASC, that
10 would be something you would remember because it could
11 have affected your eligibility for federal loans,
12 correct?

13 MR. MORENBERG: Objection.

14 A. Yes, I would remember.

15 Q. Did you ever contact Marcia Hammond?

16 A. I don't know who that is.

17 Q. She's on the witness list in this case.

18 A. I -- Yes, I do. I never contacted her. I
19 don't know who she is. Who is she?

20 MR. MORENBERG: You can't --

21 THE WITNESS: Okay. Sorry.

22 MR. MORENBERG: -- ask him
23 questions.

24 THE WITNESS: I can't.

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1 MR. MORENBERG: He asks the
2 questions.

3 THE WITNESS: I'm sorry.

4 MR. MORENBERG: Let him ask his
5 questions.

6 A. I don't recall that name.

7 Q. You don't?

8 A. I don't know who that is

9 Q. Did you ever attend a residential conference
10 where Marcia Hammond made a presentation?

11 A. Not that I recall.

12 Q. Did you ever hear that Marcia Hammond was a
13 person who was available to provide information to
14 students who were seeking licensure?

15 A. Never heard that.

16 Q. Did you ever hear that there was any person
17 on the faculty of Saybrook or elsewhere that Saybrook
18 was making available to students who would like to get
19 information about their own state's licensing
20 requirements?

21 A. No. Only after I graduated.

22 Q. Are you a member of the American
23 Psychological Association?

24 A. I think I was briefly, but I'm not now. No.